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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

LUANNE DELUNA

Debtor.

) Case No: 10-27580  
) MOTION TO COMPEL ABANDONMENT  
) OF BUSINESS ASSETS  
) TJW-1  
) DATE: APRIL 27, 2010  
) TIME: 9:30 AM  
) DEPT C  
) COURTROOM 35  
JUDGE CHRISTOPHER M. KLEIN  
11USC554

DEBTOR'S MOTION TO COMPEL TRUSTEE TO ABANDON ASSETS OF BUSINESS, TO  
WIT: "IT ALL ADDS UP" A SOLE PROPRIETORSHIP

Debtor hereby moves the Court for an order to compel the trustee to abandon the assets of  
property of the estate, to wit: business and assets of the same known as "IT ALL ADDS UP", a  
sole proprietorship.

The business is the sole proprietorship of the debtor and consists of misc business equipment,  
valued at less than \$1000, including used office furniture, computer and copier. This is a service  
business consisting primarily of bookkeeping and income tax service.

Debtor believes that there is no value to the estate, and may serve as a potential liability to the  
estate, if the motion is not granted.

1 This motion is presented in good faith, at the request of the trustee, and pursuant to guidelines of  
2 this Court.

3 WHEREFORE:

4 Debtors pray the Court enter an order to compel the trustee to abandon the business and business  
5 assets of the debtor, commonly known as "IT ALL ADDS UP".  
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8 Dated this 7<sup>th</sup> DAY OF APRIL 2010  
9

10 /s/ Timothy J. Walsh  
11 TIMOTHY J. WALSH  
12 ATTORNEY AT LAW  
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